

11:58:22 1 until every bit of work on the DWO is completed?

58:25 2 A. Correct.

11:58:25 3 Q. And even then it may take six months after  
11:58:28 4 that?

11:58:28 5 A. Yes, sometimes. It depends on the design unit  
11:58:32 6 and their workload.

11:58:35 7 Q. Right, but some --

11:58:36 8 A. It could be sooner, it could be later. If  
11:58:39 9 you've got a lot of activity, it could be -- or if  
11:58:42 10 you're trying to do another job, sometimes you have to  
11:58:45 11 ask, can you get that one posted so we can see it, but I  
11:58:48 12 mean -- that was up to the design engineer's manager and  
11:58:55 13 the workload that generated those jobs.

11:58:58 14 Q. Okay. Now, you've seen times where at least  
11:59:01 15 six months have passed before the DWO that was completed  
11:59:05 16 was posted to a PLR, correct?

11:59:08 17 A. Uh-huh.

11:59:09 18 Q. What was the longest you've ever seen before a  
11:59:12 19 DWO was posted to a PLR after it was completed?

11:59:16 20 A. It could be up to a year. Could be. I mean,  
11:59:18 21 I've seen -- I know that has been changed. I mean,  
11:59:21 22 there's sooner, but that was the case that we had --  
11:59:24 23 that I contended with, and -- that -- in some of the  
11:59:30 24 work that I was doing at the time.

59:41 25 Q. All right. Some are quick and some are not so

11:59:44 1 quick?

59:44 2 A. Uh-huh.

11:59:45 3 Q. Some get probably done in a week and some take

11:59:48 4 a year to get posted?

11:59:50 5 A. Yes.

11:59:51 6 Q. Okay.

11:59:51 7 A. It still was incumbent on me knowing that I

11:59:54 8 did that job, so I had to remember I did those jobs, so

11:59:58 9 it was up to me to remember I did it.

12:00:04 10 Q. Have you ever seen a situation where service

12:00:10 11 was actually running over a circuit that was on a DWO

12:00:16 12 but the DWO had not been posted to the PLR?

12:00:19 13 A. Yes.

12:00:21 14 Q. You shake your head like you've seen it a lot;

12:00:24 15 is that right?

12:00:24 16 A. It's possible. I mean -- I mean, we have --

12:00:28 17 Q. That happens on occasion, right?

12:00:30 18 A. On occasion. Today it does. You've got

12:00:33 19 different methods of doing it, so today it would be

12:00:36 20 rarer than it was back in the manual, the -- the manual

12:00:42 21 days.

12:00:42 22 Q. But it happens even today?

12:00:45 23 A. I -- less likely. Less likely.

12:00:48 24 Q. But you're not saying it never happens?

00:50 25 A. No, I'm not saying it doesn't happen.

12:00:52 1 Q. It does happen?

12:00:53 2 A. Yes.

12:00:54 3 Q. Yes.

12:00:55 4 Now, you said manual. What is not manual  
12:01:00 5 today?

12:01:04 6 A. When I was in design from '74 to '96, it was  
12:01:09 7 all done by pen, pencil. Today it's done in some kind  
12:01:14 8 of AutoCAD arena.

12:01:17 9 Q. The DWO is done in AutoCAD?

12:01:20 10 A. Yes.

12:01:21 11 Q. Is the PLR done in AutoCAD?

12:01:26 12 A. Some of them have been converted, not all of  
12:01:28 13 them.

12:01:29 14 Q. A lot of PLRs are still in pen and paper,  
15 right?

12:01:32 16 A. They're on paper. They're all on paper.  
12:01:35 17 There are only certain areas where they was able to  
12:01:38 18 convert them.

12:01:38 19 Q. So a lot of PLRs are still manual and a lot of  
12:01:43 20 DWOs are still manual?

21 A. No, none of the DWOs today are manual.

12:01:46 22 Q. They are all AutoCAD?

12:01:49 23 A. They have to be AutoCAD because they have to  
12:01:52 24 be able to go through all the systems to be able to  
01:55 25 flow.

12:01:55 1 Q. Now, when they've got PLR and they need to add  
02:00 2 a circuit to a PLR, don't they just manually draw it in  
3 right now?

12:02:03 4 A. That I don't know. I haven't seen how they're  
12:02:06 5 doing those today.

12:02:44 6 Q. When facility checks get sent to the OSP  
12:02:51 7 planner or the IFCPC person, what tools are available to  
12:02:55 8 those people to know what facilities are available?

12:02:59 9 MR. HARTLEY: Object, form.

12:03:00 10 A. I don't have -- I don't have knowledge of what  
12:03:05 11 they're doing today.

12:03:08 12 Q. Well, based on your experience in OSP  
12:03:12 13 planning, what was available to you?

12:03:15 14 A. The paper records.

12:03:17 15 Q. PLRs and DWOs?

12:03:19 16 A. I just had to dig through them.

12:03:21 17 Q. Now, OSP planning does have TIRKS access,  
12:03:28 18 correct?

12:03:29 19 A. No, not at the time I was in there.

12:03:31 20 Q. But now they do, right?

12:03:33 21 A. Very few of them do.

12:03:35 22 Q. Whoever wants it does?

12:03:37 23 MR. HARTLEY: Object to form.

12:03:42 24 Q. Right?

03:42 25 A. They -- it's usually not their concern.

12:03:49 1 Q. We will get to that, but the question now is  
03:52 2 if an OSP planner wants access to TIRKS, he or she can  
12:03:56 3 have it, correct?

4 MR. HARTLEY: Object to form.

12:03:57 5 A. They can request permission to any system they  
12:04:01 6 want, that their boss will sign for it.

12:04:04 7 Q. Right, as long as it's a legitimate business  
12:04:07 8 purpose?

12:04:07 9 A. Yes.

12:04:08 10 Q. And presumably TIRKS would be a legitimate  
12:04:13 11 business purpose for an OSP planner, right?

12:04:16 12 A. I don't see their need to be in there.

12:04:20 13 Q. The database that identifies all facilities  
12:04:23 14 would not be useful to an OSP planner?

12:04:26 15 A. That's the IFCPC person that will answer  
12:04:30 16 probably 90 percent of that.

12:04:36 17 Q. All that customer prem equipment and what  
12:04:40 18 capacity is available at the end of the week is not  
12:04:45 19 important to an OSP planner?

12:04:49 20 A. Usually they rely on the IFCPC to give them  
12:04:52 21 that answer.

12:04:53 22 Q. The OSP planner would call IFCPC to see what  
12:04:59 23 capacity was available at the end of the loop?

12:05:01 24 A. That's the way it was being done at the time  
05:03 25 that I had -- because they did not have TIRKS access.

12:05:07 1 Q. And IFCPC has TIRKS access?

05:10 2 A. Right.

12:05:11 3 Q. But your understanding today is if an OSP

12:05:15 4 planner wants TIRKS access today, they could get TIRKS

12:05:19 5 access?

12:05:19 6 MR. HARTLEY: Object to form.

12:05:20 7 A. Again, I don't know if -- that's not the

12:05:26 8 answer that I would expect back from them.

12:05:29 9 Q. That wasn't my question.

12:05:32 10 MR. CRAWFORD: Object, non-responsive.

12:05:34 11 Q. If an OSP planner, sir, wants access to TIRKS

12:05:38 12 database to assist with their facility checking duties,

12:05:43 13 can they get access to TIRKS database?

:05:46 14 A. Oh, yes.

12:05:48 15 MR. HARTLEY: Object, form.

12:05:48 16 Q. Thank you.

12:05:48 17 We had talked, sir, about the serving

12:06:07 18 plan, and that you -- remind me when the serving plan is

12:06:11 19 first created for a customer order.

12:06:18 20 A. When we have a response back from the two

12:06:22 21 groups that's involved. And it's only preliminary at

12:06:27 22 that time.

12:06:27 23 Q. Who does the initial serving plan? Who

12:06:31 24 creates it?

06:32 25 A. If it's a local loop involved, the local loop

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12:06:36 1 engineer will do it. The local planner will do it.

06:39 2 Q. And if it's interoffice?

12:06:40 3 A. The interoffice planner will do it.

12:06:43 4 Q. And then who do they forward it to?

12:06:46 5 A. NSS.

12:06:47 6 Q. And what does NSS do with it?

12:06:49 7 A. Formulate their answer back to the source that

12:06:51 8 the request came from.

12:06:54 9 Q. Through WALRSS?

12:06:55 10 A. Right.

12:06:56 11 Q. And then what do they do with it after that?

12:06:59 12 A. The serving plan?

12:07:00 13 Q. Yes.

12:07:02 14 A. Keep it.

12:07:02 15 Q. They wouldn't provide that information to --

12:07:04 16 A. No.

12:07:08 17 Q. If I told you that NSS does provide copies of

12:07:12 18 that serving plan to retail sales people and special

12:07:17 19 access sales people today on a regular basis, would that

12:07:20 20 surprise you?

12:07:22 21 A. It wouldn't surprise me. It's just a -- that

12:07:26 22 wasn't -- the response that we were supposed to give is

12:07:30 23 the -- they may ask for it, but our response was in

12:07:35 24 WALRSS, which is the only reply that we give back to

07:38 25 them.

12:07:38 1 Q. Right. I'm talking about what's done today by  
07:41 2 NSS.  
12:07:44 3 A. I can't answer that.  
12:07:45 4 Q. Have you heard of occasions where NSS does  
12:07:48 5 forward the serving plan on to sales people?  
12:07:50 6 A. On occasions.  
12:07:50 7 Q. And when NSS does forward the serving plan on  
12:07:55 8 to the sales people, why is that occurring?  
12:07:58 9 A. They've asked for it.  
12:08:00 10 Q. The sales people?  
12:08:00 11 A. Uh-huh.  
12:08:01 12 Q. And there's no reason why the NSS can't give  
12:08:05 13 that information to them if the sales people ask for it,  
12:08:08 14 right? They're not violating any rules by doing that,  
12:08:12 15 are they?  
12:08:12 16 A. No.  
12:08:13 17 Q. And is -- the salesperson, are they using that  
12:08:18 18 information to help their customer understand the  
12:08:21 19 circuit?  
12:08:24 20 A. Not necessarily.  
12:08:25 21 Q. And what --  
12:08:26 22 A. It's for their better understanding of what  
12:08:29 23 it's going to take to do it.  
12:08:30 24 Q. Are there any -- is there any problem with  
08:33 25 them showing that serving plan to the customer?



12:08:35 1 A. Yes.

08:35 2 Q. Why is that?

12:08:37 3 A. Proprietary information on it.

12:08:39 4 Q. About the customer's circuit?

12:08:40 5 A. Yes, the routing and the -- he can do a

12:08:48 6 generic diagram, but he cannot do the specific one. It

12:08:50 7 says priority information within Southwestern Bell.

12:08:54 8 Q. And the proprietary information is the design

12:08:57 9 of the circuit?

12:08:57 10 A. Of the routing. It's not necessarily the

12:08:59 11 design. It's the routing that we get back on that --

12:09:02 12 it's the serving plan.

12:09:04 13 Q. Aren't there sophisticated customers that want

12:09:06 14 to know the routing, that demand to know the routing?

12:09:09 15 A. Generically they can give it to them but not

12:09:13 16 specifically on the information that comes back.

12:09:15 17 Q. What do you mean generically versus

12:09:18 18 specifically?

12:09:19 19 A. I can draw a ring that looks like a ring and

12:09:22 20 put that routing on there.

12:09:24 21 Q. The nodes?

12:09:26 22 A. Yes, that's generic to anybody's network.

12:09:30 23 Q. What about a street by street?

12:09:31 24 A. No, you cannot do that.

09:33 25 Q. If I told you that sales people regularly

12:09:36 1 provide that information to customers, would that  
09:38 2 surprise you?

12:09:39 3 A. It wouldn't surprise me, but they should be --  
12:09:41 4 I would not -- I -- they're giving too much information  
12:09:50 5 if they are.

12:09:51 6 Q. I mean, you just --

12:09:53 7 A. They're not supposed to.

12:09:54 8 Q. Who put proprietary information on the bottom  
12:09:59 9 of that?

12:09:59 10 A. The outside plant engineers did and the IFCPC.

12:10:02 11 Q. So, who gave them permission to say you can't  
12:10:05 12 give this to the customer? It's not their call, is it?

12:10:08 13 A. If they don't want their records out, that's  
12:10:11 14 their call. I have to abide by what they put on there.

12:10:14 15 Q. Okay. Well, does the salesperson feel  
12:10:17 16 compelled to abide by that, do you think?

12:10:18 17 A. Yes.

12:10:19 18 Q. But if they're providing that information to  
12:10:21 19 the customer, obviously they don't?

12:10:23 20 A. They may be redrawing it or doing something  
12:10:26 21 different with it.

12:10:27 22 Q. What about a design layout record?

12:10:34 23 A. Are you talking about the one in the outside  
12:10:36 24 plant or the CPC?

10:38 25 Q. The one presented to the customers.

12:10:40 1 A. They get a form of a design -- a DLR. It's  
12:10:43 2 not the one that you see in TIRKS.  
12:10:47 3 Q. It's more generic?  
12:10:48 4 A. Very generic.  
12:10:50 5 Q. But it does identify all the nodes, correct?  
12:10:53 6 A. It only identifies the ends that they need to  
12:10:56 7 know.  
12:10:57 8 Q. If the customer wants to know the nodes on its  
12:11:02 9 circuit, including all COs, you'll give that customer  
12:11:07 10 that information, won't you?  
12:11:10 11 A. I can tell him where they are, but that's not  
12:11:13 12 a --  
12:11:13 13 Q. You wouldn't draw little circles on a line and  
12:11:16 14 say, this is Tennison CO, this is X, Y, Z CO?  
12:11:21 15 A. Again, it would be a generic diagram.  
12:11:23 16 Q. Right. Not a street by street?  
12:11:27 17 A. But that's not the reply that he's needing. I  
12:11:30 18 mean, he does not need to know how we route it, because  
12:11:34 19 it could change by the time we build it. Yes,  
12:11:39 20 facilities -- wherever that facility is available.  
12:11:43 21 Q. Customers that request a diverse circuit --  
12:11:45 22 A. Okay.  
12:11:46 23 Q. -- they do want to know the nodes on their  
12:11:48 24 circuit, don't they?  
11:49 25 MR. HARTLEY: Object, form.

12:11:50 1 A. No. We don't give them to them. We don't  
11:53 2 give them the nodes.

12:11:55 3 Q. Well, you haven't. You can't vouch for other  
12:11:58 4 people, can you?

12:11:59 5 A. No, we don't give it to them. We tell them  
12:12:02 6 it's diverse or it's not diverse.

12:12:04 7 Q. And do you think, you know, Qwest and Williams  
12:12:08 8 take that as an answer and say, thank you very much, or  
12:12:11 9 do you think Qwest and Williams want to know what their  
12:12:14 10 route is, or at least what their nodes are?

12:12:16 11 A. That's up to the marketing person to tell  
12:12:18 12 them. It's not NSS or our responsibility.

12:12:21 13 Q. Right, and you're not saying the marketing  
12:23 14 person doesn't tell them that?

12:12:24 15 A. I can't answer that.

12:12:25 16 Q. You don't know, do you? You don't know what  
12:12:32 17 the marketing person is telling the customer at all  
12:12:36 18 times, do you?

12:12:36 19 A. Not necessarily, because I'm not there with  
12:12:43 20 them.

12:12:47 21 Q. The serving plan -- what information is on a  
12:12:57 22 serving plan?

12:13:01 23 A. Basically the generic -- the fiber -- local  
12:13:06 24 loop that's required to build the service requested, as  
13:14 25 you mentioned earlier, the financials, how much it's

12:13:16 1 going to cost to place it in the ground or to do the  
13:21 2 equipment, or any other in the IFCPC answers that  
12:13:27 3 they'll -- how much central office equipment is  
12:13:29 4 involved.

12:13:32 5 Q. A serving plan is supposed to have a diagram  
12:13:35 6 on it, right?

12:13:36 7 A. That usually is in that form of a diagram or a  
12:13:39 8 word format, depending on who it comes from.

12:13:42 9 Q. And it should show the CO, the customer  
12:13:45 10 premise, the leg number and the ring and SCID number, if  
12:13:49 11 applicable?

12:13:50 12 A. If that exists today. If the SCID exists. If  
12:13:55 13 not, we just -- the answer back is just a generic  
12:13:58 14 drawing until it's finalized.

12:14:01 15 Q. And it's supposed to have the quantity of  
12:14:03 16 facilities proposed or existing?

12:14:05 17 A. That's on the case.

12:14:07 18 Q. Is that part of the serving plan?

12:14:09 19 A. No.

12:14:09 20 Q. It's already in the case?

12:14:11 21 A. It's in the case. They're responding to  
12:14:13 22 that -- to the request.

12:14:14 23 Q. And the serving plan is supposed to identify  
12:14:17 24 the model of proposed or existing equipment, such as an  
14:21 25 FLM 150 or an FLM 600?

12:14:26 1 A. Correct, to the best of their knowledge of the  
14:28 2 request that's being given.

12:14:30 3 Q. And it's supposed to have the gauge and size  
12:14:33 4 of the cable -- or copper facilities for the fiber  
12:14:37 5 identified as part of the IFR plan?

12:14:45 6 A. I think they can identify if it's previously  
12:14:48 7 been funded or not funded.

12:14:50 8 Q. They're supposed to identify the gauge and  
12:14:52 9 size of the cable, right?

12:14:53 10 A. If it's copper.

12:14:56 11 Q. And the footage of the sections?

12:15:01 12 A. That's what gives us the pricing.

12:15:03 13 Q. So that's a yes, it's supposed to have the  
12:15:06 14 footage of the sections in there?

12:15:09 15 A. Yes, they give us the footage of what they  
12:15:11 16 have to build.

12:15:12 17 Q. And account codes are supposed to be in the  
12:15:14 18 serving plan?

12:15:15 19 A. Yes.

12:15:15 20 Q. And they are supposed to designate whether  
12:15:17 21 it's a new cable, conduit or equipment?

12:15:20 22 A. Yes.

12:15:20 23 Q. And whether -- they have to note the  
12:15:20 24 reusability of the new cable, conduit and equipment?

15:23 25 A. Yes.

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12:15:24 1 Q. Are they supposed to estimate the cost of  
12:15:26 2 facilities, of the CO equipment and customer premise  
12:15:29 3 equipment?

12:15:29 4 A. That's done, yes.

12:15:31 5 Q. And the serving plan also shows for SNS and  
12:15:36 6 LPO the amount, if any, of the commonality of the two  
12:15:40 7 routes, for example, manhole section, building entrance?

12:15:44 8 A. If that's requested.

12:15:45 9 Q. Okay. Serving plan is also supposed to have a  
12:15:49 10 spreadsheet, right, or is that optional?

12:15:50 11 A. That's optional.

12:15:52 12 Q. And it's supposed to have an indication if the  
12:15:55 13 serving plan meets the current deployment guidelines?

12:16:01 14 A. I'm not sure what that means, but if -- to me  
12:16:09 15 if it's SONET, it's SONET. I mean, that's the current  
12:16:13 16 one.

12:16:13 17 Q. It's supposed to list any items of unusual  
12:16:18 18 cost, including the cost?

12:16:18 19 A. Right.

12:16:20 20 Q. And the serving plan is supposed to list the  
12:16:23 21 number of hours to develop the serving plan?

12:16:25 22 A. I have never seen it in Houston.

12:16:28 23 Q. Okay. Shouldn't the serving plan include the  
12:16:31 24 number of workdays required to turn up service to the  
16:34 25 customer in case it becomes a sale?

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12:16:36 1 A. That's the interval.

12:16:37 2 Q. That should be on there, right?

12:16:39 3 A. Yes.

12:16:39 4 Q. All right.

12:16:57 5 Do you know what businesses are located

12:16:58 6 at 1291 North Post Oak in Houston?

12:17:07 7 A. I know of one that's there.

12:17:10 8 Q. Name any businesses you know that are based at

12:17:13 9 1291 North Post Oak?

12:17:15 10 A. Nextel.

12:17:16 11 Q. Okay.

12:17:20 12 A. Because I built a project.

12:17:23 13 Q. What project did you work on for Nextel at

12:17:26 14 1291 North Post Oak?

12:17:28 15 A. Several STNs.

12:17:35 16 Q. And what is an STN?

12:17:37 17 A. It's a product that's in the FCC 73 Tariff

12:17:41 18 that provides a protected facility.

12:17:46 19 Q. It's like a SONET ring, right?

12:17:49 20 A. That's what it is, it's a SONET ring with --

12:17:51 21 Q. Self-healing transport network?

12:17:55 22 A. Right, self-healing transport network. S-T-N,

12:17:59 23 that's what it is.

12:18:00 24 Q. And STN, it is SWBT policy, is it not, that

18:04 25 all STNs should have two CO level diversity if at all.



12:18:08 1 possible, correct?

18:11 2 A. If that's what's been requested, they can do

12:18:18 3 one CO.

12:18:19 4 Q. On an STN?

12:18:21 5 A. Uh-huh.

12:18:21 6 Q. So if they requested a one CO STN, you'll

12:18:25 7 build it, otherwise all STNs are supposed to be --

12:18:31 8 A. Well, it's on the request. In other words,

12:18:32 9 they tell us what offices they want to go to. On the

12:18:35 10 WALRSS case that comes across, it has what offices they

12:18:38 11 want to go to.

12:18:40 12 Q. So people can order diversity. If a customer

12:18:43 13 wants diversity, you'll build it for him?

12:18:46 14 A. STN is considered a normal facility in the

12:18:50 15 tariff.

12:18:50 16 Q. Right.

12:18:51 17 A. It has that diversity as part of that.

12:18:54 18 Q. STN assumes diversity, right?

12:18:57 19 A. Correct.

12:18:58 20 Q. And primarily it assumes diversity through two

12:19:05 21 COs; that's in the engineering handbook, is it not?

12:19:10 22 A. There are two COs in most of the ones that we

12:19:14 23 build. I've seen some that are -- don't require it.

12:19:20 24 Q. Now, an STN is not a dedicated ring to that

19:23 25 customer, is it?

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12:19:24 1 A. No.

19:24 2 Q. It's a shared ring?

12:19:30 3 A. It generally is shared.

12:19:32 4 Q. Okay. And the majority of those STN rings  
12:19:36 5 built by SWBT have two CO diversity at a minimum,  
12:19:40 6 correct?

12:19:41 7 A. Again, if it was -- if it was requested.

12:19:44 8 Q. I'm talking about out of the STN rings  
12:19:50 9 deployed by SWBT. According to what you just said, the  
12:19:54 10 majority do have --

12:19:55 11 A. Yes, the majority have two COs, yes.

12:19:58 12 Q. Diversity?

12:19:59 13 A. Right.

12:19:59 14 Q. So you built several SONET rings for 1291  
12:20:06 15 North Post Oak, right?

12:20:07 16 A. Yes.

12:20:08 17 Q. What is the -- what is the design of those  
12:20:12 18 rings?

12:20:18 19 MR. HARTLEY: Object to form.

12:20:22 20 A. Multiple CO and multiple customer.

12:20:35 21 Q. You built those rings to the two closest COs,  
12:20:38 22 correct?

12:20:38 23 A. No, based on the request they did.

12:20:41 24 Q. Did the customer request a certain build?

20:45 25 A. The request that came in through WALRSS did.

12:20:48 1 Q. Okay. Which you assume came from the  
20:51 2 customer, unless the sales guy is just making it up,  
12:20:55 3 right?

12:20:57 4 A. The customer knew his two locations, the sales  
12:21:02 5 guy had two; probably had the COs that he thought they  
12:21:06 6 needed to go to.

12:21:07 7 Q. So the WALRSS case requested two COs?

12:21:12 8 A. It could be one, two, multiple, whatever they  
12:21:14 9 required.

12:21:16 10 Q. Well, the rings that you built at 1291 North  
12:21:21 11 Post Oak, are they single CO rings or are they double CO  
12:21:26 12 rings?

12:21:27 13 A. They're multiple CO rings.

12:21:29 14 Q. Multiple CO rings. There were no single CO  
12:21:31 15 rings you built at 1291 North Post Oak?

12:21:36 16 A. Not for STN service.

12:21:42 17 Q. Okay. And the STN rings that you built, what  
12:21:52 18 is their general configuration? Do you remember which  
12:21:55 19 COs they run to?

12:21:57 20 A. Kind of sort of.

12:21:59 21 Q. Which ones?

12:22:04 22 A. Jackson and Capital, or Clay, depending on the  
12:22:10 23 request, and their two nodes. Or their mitsos, I call  
12:22:15 24 it.

22:16 25 Q. Right.

12:22:17 1 Was one of their nodes the 1291 North  
22:21 2 Post Oak?  
12:22:21 3 A. Yes.  
12:22:22 4 Q. And the other node was a mitso?  
12:22:25 5 A. That is the mitso. 1291 is their mitso.  
12:22:29 6 Q. And then what was the second node, or they  
12:22:31 7 were both at 1291 North Post Oak?  
12:22:34 8 A. The other mitso that they determined that they  
12:22:38 9 wanted to go to.  
12:22:38 10 Q. A mitso not at 1291 North Post Oak?  
12:22:42 11 A. Right.  
12:22:43 12 Q. So you connected their two POPs, their nodes,  
13 right?  
14 A. Right.  
15 Q. With two COs?  
12:22:52 16 A. Generally that's usually what the request was.  
12:22:54 17 Q. Or multiple COs?  
12:22:56 18 A. Or it depends on what the request was.  
12:22:58 19 Usually the four-node ring.  
12:23:02 20 Q. Do you recall the situation at 1291 where you  
12:23:04 21 had a large backbone fiber coming into the zero manhole,  
22 a large count backbone fiber coming into the zero  
23 manhole?  
12:23:09 24 A. When you say zero manhole --  
23:12 25 Q. The manhole closest to the outside of the

12:23:15 1 building.

23:15 2 A. Yes, we had a large fiber there, yes.

12:23:18 3 Q. Okay. And there was a smaller distribution  
12:23:22 4 fiber from that manhole into the building, correct?

12:23:24 5 A. Correct.

12:23:25 6 Q. And do you recall how many fibers you had  
12:23:28 7 spliced for that service?

12:23:29 8 A. Two in, two out.

12:23:31 9 Q. Two in, two out. So two on one manhole  
12:23:36 10 nearby 1291 Post Oak, and then coming out a different  
12:23:40 11 side for diversity at 1291 North Post Oak, you had two  
12:23:48 12 fibers coaxed into the other manhole?

13 A. Right.

12:23:51 14 Q. Going to the other CO?

12:23:53 15 A. Correct.

12:23:53 16 Q. And at that manhole you had two fibers coaxed  
12:23:56 17 into that backbone cable going into -- going to the  
12:23:58 18 second CO?

12:23:59 19 A. Yes.

12:24:00 20 Q. Why did you only splice two fibers in each  
12:24:03 21 manhole?

12:24:03 22 A. Because that was all we needed for the brain.  
12:24:07 23 That's all they gave me. They wouldn't put any more on  
12:24:10 24 the prints.

24:11 25 Q. Because the customer only needed two in, two

12:24:13 1 out, that's all you had spliced?

24:15 2 A. Correct. That's all the request was for.

12:24:20 3 Q. Okay. Now, assuming all your years, you're  
12:24:33 4 familiar with the term secondary office, aren't you?

12:24:36 5 A. Yes.

12:24:37 6 Q. What is secondary -- a secondary -- when you  
12:24:40 7 hear secondary office, or secondary wire center, you're  
12:24:49 8 familiar with those terms, right; you know what people  
12:24:51 9 are talking about?

12:24:51 10 A. Since we have started with STN and that type  
12:24:54 11 of service, yeah. Before I wasn't.

12:24:56 12 Q. What does a secondary office or secondary wire  
12:25:02 13 center mean to you?

12:25:05 14 A. We have paired up the offices in the Houston  
12:25:10 15 metro area so every office has its paired office.

12:25:20 16 Q. What does that mean, though? Why do you pair  
12:25:23 17 up two offices together?

12:25:24 18 A. Because the original tariff of the FCC 73 for  
12:25:30 19 SNS-2 required two offices.

12:25:34 20 Q. S-N-S 2?

12:25:41 21 A. Secure Net, which is the only thing left in  
12:25:45 22 the tariff. I don't even know if option 2 is still in  
12:25:47 23 there. It was in there at one time, and the STN is  
12:25:49 24 really a take-off of that. It's the -- it's the newer  
25:58 25 version.

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12:25:59 1 Q. So you created paired COs or secondary wire  
12:26:04 2 centers to support this tariff offering?

12:26:06 3 A. We identified them for that purpose.

12:26:08 4 Q. And it's an internal designation, right? It's  
12:26:11 5 something you use internally?

12:26:12 6 A. The planners and the outside -- the inner  
12:26:16 7 office planners work together to do that.

12:26:17 8 Q. Right. And what is this offering, in a  
12:26:20 9 nutshell?

12:26:20 10 A. Today it's STN.

12:26:23 11 Q. So, however it's described in the tariff, it's  
12:26:26 12 this STN --

12:26:28 13 A. Right.

12:26:30 14 Q. -- which is a SONET ring?

12:26:33 15 A. Under STN, it is. Under SNS, it could be any  
12:26:38 16 type of facility. But STN does say SONET.

12:26:42 17 Q. And why do you need a -- two COs together for  
12:26:47 18 that?

12:26:49 19 A. It's for -- if the customer wants to drop and  
12:26:55 20 add capability to his other end-users or his carriers to  
12:27:00 21 protect that path.

12:27:02 22 Q. I mean, if you're going to do -- if you're  
12:27:05 23 going to plan a diverse CO -- I'm sorry, if you're going  
12:27:09 24 to plan a diverse SONET ring, why does it matter which  
27:15 25 COs you go to for diversity?

12:27:19 1 A. That's getting out of the network where the  
12:27:21 2 COs are -- access is not the issue. He determines the  
12:27:28 3 access by his local serving office. The diversity is  
12:27:32 4 only for when he's going outside of the SONET ring to  
12:27:36 5 other carriers or customers or whatever and you need  
12:27:40 6 drop and continue as the -- as TIRKS would refer to it  
12:27:44 7 as, which means if it drops in one CO it continues in  
12:27:48 8 the other.

12:27:49 9 Q. Well, you can have a SONET ring that only goes  
12:27:52 10 to a single CO, right?

12:27:54 11 A. That's fine. That's what I was saying  
12:27:56 12 earlier. STN rings are only one CO. They're protected  
12:28:01 13 out in the loop or they're protected through a CO as a  
12:28:06 14 cross connect, but there's no equipment there.

12:28:08 15 Q. Now, you testified that the majority of STN  
12:28:10 16 rings are through multiple COs?

12:28:13 17 A. Because you insisted that I answer you that  
12:28:16 18 way, I said some of them are only one CO.

12:28:19 19 Q. Some are, but the majority have multiple COs?

12:28:23 20 A. It depends on -- yeah, the majority -- I've  
12:28:24 21 seen them both ways, so I can't even say if it's the  
12:28:27 22 majority or not. If the request came in for multiple  
12:28:31 23 CO, we honored that.

12:28:32 24 Q. When you design a diverse path to two  
28:36 25 different offices, how do you determine the secondary



12:28:39 1 office to utilize?

28:40 2 A. That's written in the list that the planners  
12:28:42 3 have and they determine that.

12:28:45 4 Q. So for every CO you've determined a list of  
12:28:48 5 what the secondary wire center ought to be for a CO?

12:28:51 6 A. To use the literal determination, I did create  
12:28:55 7 that. Me and the other planner that was there at the  
12:28:57 8 time.

12:28:57 9 Q. What criteria did you use to match them?

12:29:01 10 A. Obvious COs which should be paired together.  
12:29:07 11 When I say obvious, is that there --

12:29:09 12 Q. Is it a distance issue, is it a technology  
12:29:13 13 issue?

12:29:13 14 A. It's just more of a -- could be sometimes -- a  
12:29:16 15 couple of them are geographic. A couple of them are  
12:29:20 16 just obviously paired together because that's the area  
12:29:22 17 they're in. Some are just not -- there's no relation to  
12:29:26 18 the two that -- except that's the close proximity --  
12:29:32 19 they were in the geographic area. Some are obvious and  
12:29:35 20 some are not as obvious as I would look at it, and  
12:29:39 21 that's -- I mean, we -- that was based on -- SNS -- I  
12:29:44 22 can't even think of which one it was now. But it was --  
12:29:47 23 that document was published, I know, in the FCC tariff.  
12:29:51 24 I mean, some sort of format of that, of which offices  
29:55 25 were opened or closed.